

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. S1-4:14CR00311 CEJ (DDN)
)	
CRISTOPHER M. CRISTEA and,)	
DAVID COREY TOLLE,)	
)	
Defendants.)	

DISCLOSURE OF ARGUABLY SUPPRESSIBLE EVIDENCE AGAINST DEFENDANTS
CRISTOPHER M. CRISTEA AND DAVID COREY TOLLE

COMES NOW the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Steven A. Muchnick, and Gwendolyn E. Carroll, Assistant United States Attorneys for said District, and for the Government's Disclosure Of Arguably Suppressible Evidence Against Defendants Cristopher M. Cristea, and David Corey Tolle, states, as follows:

1. May 10, 2012 – On-The-Record Statement of Cristopher M. Cristea to the Office of Missouri Secretary of State, Securities Division. The government may offer portions of this statement into evidence against defendant Cristopher M. Cristea. The government would call Scott Johnson, Investigator, Office of Missouri Secretary of State, Securities Division, and Patricia A. Stewart, Certified Court Reporter, as witnesses at a pretrial suppression hearing concerning this statement.

2. August 22, 2012 – On-The-Record Statement of David Corey Tolle to the Office of Missouri Secretary of State, Securities Division. The government may offer portions of this statement into evidence against defendant David Corey Tolle. The government would call Scott

Johnson, Investigator, Office of Missouri Secretary of State, Securities Division, and Patricia A. Stewart, Certified Court Reporter, as witnesses at a pretrial suppression hearing concerning this statement.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

s/Steven A. Muchnick
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CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

John P. Rogers – Attorney for defendant Cristopher M. Cristea
Lenny Kagan - Attorney for defendant David Corey Tolle

s/ Steven A. Muchnick
Steven A. Muchnick - 27597MO
Assistant United States Attorney